

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

(Jointly Administered)

**NOTICE OF RESCHEDULED DEADLINES IN CONNECTION
WITH THE SALE OF THE DEBTORS' ASSETS FREE AND CLEAR
OF ANY AND ALL CLAIMS, INTERESTS, AND ENCUMBRANCES**

PLEASE TAKE NOTICE that on June 22, 2023, the Court entered the *Order (I) Approving Bid Procedures for Sale of the Debtors' Assets, (II) Approving Bid Protections, (III) Scheduling Certain Dates with Respect Thereto, (IV) Approving the Form and Manner of Notice Thereof, and (V) Approving Contract Assumption and Assignment Procedures* [Docket No. 701] (the “Bid Procedures Order”)².

PLEASE TAKE FURTHER NOTICE that on June 26, 2023, the Debtors filed the *Notice of Auction for the Sale of the Debtors Assets Free and Clear of Any and All Claims, Interests, and Encumbrances* [Docket No. 717], which set forth, among other things, the hearing for approval of any Sales, which is presently scheduled to commence on August 7, 2023, at 2:00 p.m. (prevailing Central Time), and certain deadlines associated therewith.

PLEASE TAKE FURTHER NOTICE that on July 26, 2023, the Debtors filed the *Notice of Rescheduled Auction for the Sale of the Debtors Assets Free and Clear of Any and All Claims, Interests, and Encumbrances* [Docket No. 1099], which set August 2, 2023 as the date the Debtors intend to conduct the Auction (the “Rescheduled Auction Date”).

PLEASE TAKE FURTHER NOTICE that due to the Rescheduled Auction Date, the deadline to object to Adequate Assurance is being rescheduled from July 31, 2023 to **August 4, 2023**, and the deadline to object to the Sale is being rescheduled from August 3, 2023 to **August 7, 2023 at 9:00 a.m. (prevailing Central Time)**.

PLEASE TAKE FURTHER NOTICE that pursuant to the Bid Procedures order, copies of this *Notice of Rescheduled Deadlines in Connection With the Sale of the Debtors' Assets Free and Clear of any and All Claims, Interests, and Encumbrances* (“Sale Notice”) will be served upon the Sale Notice Parties: (a) the Office of the United States Trustee for the Southern District of Texas; (b) counsel to the Official Committee of Unsecured Creditors, McDermott Will & Emery LLP, Attn:

¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company's principal place of business and the Debtors' service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Bid Procedures Order.

Maris J. Kandestin (mkandestin@mwe.com), Chuck Gibbs (crgibbs@mwe.com), Marcus Helt (mhelt@mwe.com); (c) counsel to the DIP Agent, Greenberg Traurig, LLP, Attn: John D. Elrod, Esq. (elrodj@gtlaw.com) and Shari Heyen, Esq. (heyens@gtlaw.com); (d) the state Attorneys General for states in which the Debtors conduct business; (e) the Internal Revenue Service; (f) the Securities and Exchange Commission; (g) the Environmental Protection Agency and similar state agencies for states in which the Debtors conduct business; (h) all known holders of liens, encumbrances, and other claims secured by the Assets; (i) all known creditors of the Debtors; (j) each governmental agency that is an interested party with respect to the Sale and transactions proposed thereunder; (k) any party that has requested notice pursuant to Bankruptcy Rule 2002; (l) all parties that have formally expressed an interest in potentially bidding upon some or all of the Assets; and (m) any other party entitled to notice pursuant to Bankruptcy Local Rule 9013-1(d).

Dated: July 27, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Michael D. Warner

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Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2023, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner